

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LIFE FOR RELIEF & DEVELOPMENT, a
Foreign Not-For Profit Organization,

Plaintiff,

vs

Case No: 2:12-CV-13550
Hon. Denise Page Hood

BANK OF AMERICA, N.A.,
a national banking association,

Defendant.

AKEEL & VALENTINE, PLC
Shereef H. Akeel (P54345)
S. Hussain Akbar (P67967)
888 West Big Beaver, Ste. 910
Troy, MI 48084
(248) 269-9595
shereef@akeelvalentine.com
hakbar@akeelvalentine.com

Counsel for Plaintiff

BODMAN PLC
Dennis J. Levasseur
1901 St. Antoine Street
6th Floor at Ford Field
Detroit, MI 48226
Tel: (313) 393-7596

MCGUIREWOODS LLP
John Huske Anderson Jr.
jhanderson@mcguirewoods.com
300 N. Third Street, Ste. 320
Wilmington, NC 28401
Tel: (910) 254-3828

Robert A. Muckenfuss
rmuckenfuss@mcguirewoods.com
Carlo L. Rodes
crodes@mcguirewoods.com
201 N. Tryon Street
Suite 3000
Charlotte, NC 28202
Tel: (704) 343-2394

Counsel for Bank of America, N.A.

DEFENDANT BANK OF AMERICA, N.A.'S EXPERT WITNESS DISCLOSURE

Pursuant to Fed. R. Civ. P. 26(a)(2), Defendant Bank of America, N.A. ("BANA"), by

counsel, here submits the following expert witness list, the member(s) of which BANA reserves the right to call as an expert at trial:

1. Dennis M. Lormel
President & CEO
DML Associates, LLC
19309 Winmeade Drive, #110
Lansdowne, VA 20176

Mr. Lormel's expertise and anticipated testimony in this matter concerns banking/financial services industry standards under the Bank Secrecy Act and anti-money laundering laws as they relate to bank compliance and reporting requirements. His expertise and anticipated testimony also extends to banking/financial services industry standards concerning internal bank account investigations and risk assessment. More specifically, Mr. Lormel will opine on the procedures adhered to and steps taken in closing the subject accounts, as well as BANA's decision to keep them closed, in the context of industry standards as well as banking laws and regulations.

Mr. Lormel charges \$350 per hour for his time, both for study and testimony.

A report setting forth all of Mr. Lormel's (i) opinions and the basis and reasons for those opinions, (ii) the facts or data considered by Mr. Lormel informing his opinions, and (iii) any exhibits that will be used to summarize or support Mr. Lormel's opinions will be forthcoming.

Mr. Lormel has testified as an expert witness in the following cases within the last four years:

- Raymond Jackson, et al v. Regions Bank; USDC, Middle District of Tennessee, Nashville Division; Case No. 3:09-cv-00908
- Horn v. High Point Services, Inc.; et al; USDC of California, Central District; Case No. EDCV 12-01604 VAP(DTBx)

Attached to this Notice as Exhibit A is Mr. Lormel's biography and curriculum vitae, summarizing his qualifications to testify as an expert in this matter. A list of Mr. Lormel's publications is attached hereto as Exhibit B.

BANA reserves the right to supplement this list as discovery in this matter continues. BANA also reserves the right to designate any rebuttal experts to the extent Plaintiff designates its own expert(s).

Dated: November 14, 2014

Respectfully submitted,

/s/ Carlo L. Rodes
Robert A. Muckenfuss
rmuckenfuss@mcguirewoods.com
Carlo L. Rodes
crodes@mcguirewoods.com
McGUIREWOODS LLP
201 N. Tryon Street
Suite 3000
Charlotte, NC 28202
Tel: (704) 343-2394
Fax: (704) 343-2300

John Huske Anderson, Jr.
McGUIREWOODS LLP
300 N. Third Street
Suite 320
Wilmington, NC 28401
Tel: (910) 254-3828
Fax: (910) 254-3900
jhanderson@mcguirewoods.com

BODMAN PLC
Dennis J. Levasseur
1901 St. Antoine Street
6th Floor at Ford Field
Detroit, MI 48226
Tel: (313) 393-7596

Counsel for Bank of America, N.A.